MARGARET M. SHALLEY, ESQ.

MARGARET M. SHALLEY & ASSOCIATES, LLC 225 Broadway, Suite 715

New York, NY 10007

917-841-0231 (Phone)

212-566-8165 (Fax)

margaretshalley@aol.com

January 19, 2022

VIA ECF & EMAIL

The Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J. January 19, 2022

Re: *U.S. v. Ekin Erkan* 19 Cr. 179 (RA)

Dear Judge Abrams:

I am the attorney for the defendant, Ekin Erkan, in the above-referenced matter. On February 14, 2018, the defendant was released on a \$100,000 personal recognizance bond, signed by 2 financially responsible persons, with travel limited to the Southern and Eastern Districts of New York and the Southern District of Ohio. The purpose of this letter is to respectfully request a modification of the defendant's bail conditions. Specifically, it is requested that the Court permit Mr. Erkan to travel to New Brunswick, New Jersey on January 20, 2022, to spend the evening at the home of his girlfriend's parents. He will be spending the night there and will be leaving the following day. Mr. Erkan was approved to travel to New Jersey for Christmas; however, he did not go because of COVID-19. Pretrial Services has no objection to this request and the Government defers to Pretrial. Accordingly, it is respectfully requested that the Court permit Mr. Erkan to travel to New Brunswick, New Jersey from January 20, 2022, through January 21, 2022. The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,

/s/

Margaret M. Shalley

cc: AUSA Mary Elizabeth Bracewell U.S.P.S.O. Dayshawn Bostic Via email